

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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MICHAEL MULGREW, as President of the UNITED FEDERATION OF TEACHERS, Local 2, American Federation of Teachers, AFL-CIO, VITO J.	:
FOSSELLA, individually and as Staten Island Borough President, THE A. PHILIP RANDOLPH INSTITUTE, THE COALITION OF BLACK TRADE UNIONISTS, THE LABOR COUNCIL FOR LATIN AMERICAN ADVANCEMENT, JESSICA SCARCELLA-SPANTON, individually and as New York State Senator, DAVID WEPRIN, individually and as New York State Assemblyman, DAVID CARR, individually and as New York City Council Member, NICOLE MALLIOTAKIS, individually and as United States Congresswoman, JOSEPH BORELLI, individually and as New York City Council Member, JAMES SKOUFIS, individually and as New York State Senator, ROB ROLISON, individually and as New York State Senator, AILEEN GUNTHER, individually and as New York State Assemblywoman, CHRISTOPHER EACHUS, individually and as New York State Assemblyman, KARL BRABENEC, individually and as New York State Assemblyman, BRIAN MAHER, individually and as New York State Assemblyman, MICHAEL REILLY, individually and as New York State Assemblyman, MICHAEL TANNOUSIS, individually and as New York State Assemblyman, KAMILLA HANKS, individually and as New York City Councilmember, JAIME WILLIAMS, individually and as New York State Assemblywoman, ANDREW J. LANZA, individually and as New York State Senator, IWEN CHU, individually and as New York State Senator, MONICA MARTINEZ, individually and as New York State Senator, CLIFF HAGEN, TROY McGHIE, MARTHA MAZIER, PAUL CAMINITI, CARLY BIANCHINI, HANNAH CHOI, FRANK GARCIA, LINDSEY LAMPF,	:
Plaintiffs,	:
- against -	:
UNITED STATES DEPARTMENT OF TRANSPORTATION, FEDERAL HIGHWAY ADMINISTRATION, SHAILEN BHATT, in his	:

official capacity as Administrator of the Federal :
Highway Administration, RICHARD J. MARQUIS, in :
his official capacity as Division Administrator of the :
New York Division of the Federal Highway :
Administration, the METROPOLITAN TRANSIT :
AUTHORITY, the TRIBOROUGH BRIDGE AND :
TUNNEL AUTHORITY, STEPHANIE :
WINKELHAKE, P.E., in her official capacity as Chief :
Engineer of the New York State Department of :
Transportation, the NEW YORK CITY :
DEPARTMENT OF TRANSPORTATION :
: Defendants. :
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DECLARATION OF ALAN KLINGER

Alan M. Klinger, an attorney duly admitted to practice before this Court, hereby declares pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am counsel for Plaintiffs in this action, and I am familiar with the pleadings and proceedings in this action.
2. I submit this Declaration in support of Plaintiffs' motion for leave to file a Second Amended Complaint.
3. Annexed hereto as Exhibit "A" is the Proposed Second Amended Complaint.
4. Annexed hereto as Exhibit "B" is a redlined version of the Proposed Second Amended Complaint, reflecting the proposed revisions to the First Amended Complaint.

Dated: July 26, 2024
New York, New York

STEPTOE LLP

By:

/s/ Alan M. Klinger

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